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6 Attorneys for Defendants YOCO INC. and
M.A.X. SPORTS ENTERPRISE INC.

8 UNITED STATES DISTRICT COURT

9 CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

11 DANURI TEX CO., LTD., a Korea
corporation,

12 Plaintiff,

13 vs.

14 YOCO, INC., a New York corporation;
15 M.A.X. SPORTS ENTERPRISE, INC.,
a New York corporation; and DOES 1
16 to 10, inclusive,

17 Defendants.

CASE NO. 2:19-cv-07430-JFW (PLAx)

[Assigned to The Hon. John F. Walter,
Courtroom 7A]

**JOINT STIPULATION TO
TRANSFER VENUE**

[Filed concurrently with [Proposed]
Order]

Action Filed: August 27, 2019
Trial Date: None Set

19 **IT IS HEREBY STIPULATED** by and between Plaintiff DANURI TEX
20 CO., LTD. ("Plaintiff") and Defendants YOCO INC. and M.A.X. SPORTS
21 ENTERPRISE INC. ("Defendants"), by and through their respective counsel of
22 record, that this action be transferred from the United States District Court for the
23 Central District of California, Western Division to the United States District Court
24 for the Southern District of New York.

25 Transfer to the Southern District of New York is for the convenience of the
26 parties and witnesses, and is in the interests of justice. 28 U.S.C. § 1404(a).
27 Defendants are both New York corporations with their headquarters and principal
28 places of business in New York, and a substantial part of the alleged events giving

1 rise to this action occurred in New York. Defendants also assert that the Central
2 District of California lacks personal jurisdiction over them. Accordingly, it would
3 be inconvenient and contrary to the interests of justice for this action to proceed in
4 the Central District of California. Therefore, Plaintiff and Defendant stipulate to
5 and request an Order transferring this action to the United States District Court for
6 the Southern District of New York.

7 **IT IS HEREBY FURTHER STIPULATED** that Defendants shall plead,
8 answer, move, or otherwise respond to Plaintiff's complaint within thirty (30) days
9 of the proper Notice of Transfer to the United States District Court for the Southern
10 District of New York.

11 **IT IS HEREBY FURTHER STIPULATED** that Plaintiff shall pay any and
12 all transfer and filing fees in order to transfer this case to the Southern District of
13 New York, and each party shall bear their own attorneys' fees and costs associated
14 with the present joint stipulation.

15
16 DATED: September 27, 2019 ACI LAW GROUP, PC

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18 By: /s/ John A. Axtell
19 JOHN A. AXTELL
20 Attorneys for Plaintiff DANURI TEX CO.,
LTD.

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22 DATED: September 27, 2019 LEWIS BRISBOIS BISGAARD & SMITH LLP

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24 By: /s/ Paul S. Kim
25 TREVOR J. INGOLD
26 PAUL S. KIM
27 Attorneys for Defendants YOCO INC. and
M.A.X. SPORTS ENTERPRISE INC.

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ATTORNEY ATTESTATION

I, Paul S. Kim, attest that the other signatory listed above, and on whose behalf this document is submitted, concurs in the filing's content and has authorized the filing. I declare under penalty of perjury under the laws of the United States of America and the State of California that the foregoing is true and correct.

DATED: September 27, 2019 LEWIS BRISBOIS BISGAARD & SMITH LLP

By: /s/ *Paul S. Kim*
TREVOR J. INGOLD
PAUL S. KIM
Attorneys for Defendants YOCO INC. and
M.A.X. SPORTS ENTERPRISE INC.